UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : No. 1:24-CR-

:

v. : (Judge)

:

CHRISTOPHER MARGAIS WINDSOR.: (electronically filed)

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Defendant

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud)

At times material to this Information:

BACKGROUND

- 1. The defendant, CHRISTOPHER MARGAIS WINDSOR, was a resident of Brooklyn, New York.
- 2. Audio equipment (or "production equipment") refers to devices that reproduce, record, or process sound. This includes microphones, radio receivers, AV receivers, CD players, tape recorders, amplifiers, mixing consoles, effects units, handheld transmitters, headphones, and speakers. Audio equipment is widely used in many

different scenarios, such as concerts, bars, meeting rooms and the home where there is a need to reproduce, record and enhance sound volume.

- 3. Victim Company 1 ("VC1") was a business located in York, Pennsylvania, in the Middle District of Pennsylvania, that offered audio equipment for rent.
- 4. Victim Company 2 ("VC2") was a business located in Mechanicsburg, Pennsylvania, in the Middle District of Pennsylvania, that offered audio equipment for rent.
- 5. LiquidSpace was an online marketplace for renting office space.
 - 6. OfferUp was an online, customer-to-customer marketplace.

THE CONSPIRACY

7. Beginning on or about November 14, 2017 and continuing until on or about October 12, 2022, in the Middle District of Pennsylvania, and elsewhere, the defendant,

CHRISTOPHER MARGAIS WINDSOR,

did knowingly conspire and agree, together and with other persons both known and unknown to the United States Attorney, to knowingly devise and intend to devise a scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice, to transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, any writing, sign, signal, picture and sound, in violation of 18 U.S.C. § 1343 (Wire Fraud).

MANNER AND MEANS

- 8. It was part of the conspiracy that beginning on or about November 14, 2017, and continuing until about October 12, 2022, the defendant, CHRISTOPHER MARGAIS WINDSOR, along with other unindicted coconspirators, established bank accounts using false and fictitious names and email addresses. Through those accounts, false names, and addresses, they received fraud-induced sound production equipment from victims across the United States.
- 9. It was further part of the conspiracy that on or about June 29, 2022, CHRISTOPHER MARGAIS WINDSOR used the lawrenceralph836@gmail.com email address to contact VC1, identifying himself using the pseudonym "Ralph Lawrence," and falsely posed as a representative of "Dream Team Records." "Lawrence" inquired of VC1

about renting audio equipment, including four JBL VRX932LAP "Self-powered constant curve line array modules" (or "JBL array modules") and advised that VC1 was to deliver the audio equipment to Phillips Office Interiors, located at 6345 Flank Drive, Harrisburg, Pennsylvania.

- 10. It was further part of the conspiracy that on or about June 29, 2022, CHRISTOPHER MARGAIS WINDSOR used the lawrenceralph836@gmail.com email address to reserve Amtrak train seats for himself and an unindicted coconspirator from Penn Station, New York to Harrisburg, Pennsylvania.
- 11. It was further part of the conspiracy that on or about June 30, 2022, CHRISTOPHER MARGAIS WINDSOR caused an email from the address "westriverdinner@gmail.com" to contact LiquidSpace, using the pseudonym "Ashley Thompson," to reserve a meeting room at Phillips Office Interiors, located at 6345 Flank Drive, Harrisburg, Pennsylvania.
- 12. It was further part of the conspiracy that on or about June 30, 2022, a VC1 representative delivered audio equipment worth approximately \$21,245 to CHRISTOPHER MARGAIS WINDSOR, who used the pseudonym "Ashley Thompson" and posed as a representative

of "Dream Team Records," at 6345 Flank Drive, Harrisburg, Pennsylvania.

- 13. It was further part of the conspiracy that on or about June 30, 2022, CHRISTOPHER MARGAIS WINDSOR, using the email address lawrenceralph836@gmail.com, used OfferUp to sell the JBL array modules. On or about June 30, 2022, WINDSOR received an email from notify@email.offerup.com to the lawrenceralph836@gmail.com address stating, in part, "Congratulations on posting your first item on OfferUp! Congratulations on posting your first item on OfferUp! JBL VRX932lap Qsc Ev \$1,500 Brooklyn, NY."
- 14. It was further part of the conspiracy that on or about June 30, 2022, CHRISTOPHER WINDSOR mailed the audio equipment obtained from VC1 via The UPS Store located at 6059 Allentown Boulevard, Harrisburg, PA 17112 to J.D. at address 1673 West Cris Avenue, Hermosa Village, CA 92802.
- 15. It was further part of the conspiracy that CHRISTOPHER MARGAIS WINDSOR used the jourdanwilliams026@gmail.com email address to contact VC2, identifying himself using the pseudonym "Jourdan Williams," and falsely posed as a representative of "Dreamer

Mission." "Williams" inquired of VC2 about renting audio equipment and advised that VC2 was to deliver the audio equipment to the Holiday Inn Express located at 2055 Technology Parkway, Mechanicsburg, Pennsylvania.

MARGAIS WINDSOR, along with other unindicted coconspirators, committed this fraudulent scheme in Alabama, Arizona, California, Connecticut, Delaware, the District of Columbia, Florida, Georgia, Illinois, Indiana, Maryland, Massachusetts, Michigan, Missouri, Nevada, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Virginia, and Wisconsin, resulting in the theft of audio equipment valued at approximately \$1,085,651.84 in total.

All in violation of Title 18, United States Code, Section 1349.

THE UNITED STATES ATTORNEY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 2314

(Interstate Transportation of Stolen Goods)

- 17. For the purposes of Count 2 of this Information, the allegations set forth in paragraphs 1 through 6 and 8 through 16 are incorporated herein.
- 18. On or about June 30, 2022, in the Middle District of Pennsylvania, and elsewhere, the defendant,

CHRISTOPHER MARGAIS WINDSOR.

aiding and abetting other persons both known and unknown to the United States Attorney, did transport, transmit, and transfer in interstate or foreign commerce goods, wares, merchandise, securities and money of the value of \$5,000 or more, that is, audio equipment worth approximately \$21,245, from The UPS Store located at 6059 Allentown Boulevard, Harrisburg, Pennsylvania to 1673 West Cris Avenue, Hermosa Village, California, knowing that the same was stolen, converted, and taken by fraud.

All in violation of Title 18, United States Code, Sections 2314 and

2.

GERARD M. KARAM United States Attorney

February 15, 2024

<u>s/ David C. Williams</u>
DAVID C. WILLIAMS
Assistant United States Attorney